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IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ALASKA AT ANCHORAGE

STANDARD INSURANCE COMPANY,

Plaintiff,

v.

TRACY GARDNER,

Defendant.

TRACY GARDNER, in her individual and representative capacity and on behalf of the Plan,

Counterclaimant and
 Third-Party Plaintiff,

v.

STANDARD INSURANCE COMPANY; and
 LINDA WHEELER, individually; and ANDREW
 KLAMSER, individually,

Counterclaim Defendant
 and Third-Party Defendants.

Case No. 3:05-cv-00225-TMB

**SECOND UNOPPOSED
 MOTION FOR EXTENSION OF TIME**

COMES NOW plaintiff Standard Insurance Company (“Standard”), by and through counsel, and moves the Court for an extension of time until April 25, 2006, to answer the counterclaim and third-party claims of Tracy Gardner.

As noted in previous filings (Docket Nos. 17 and 19), the parties are currently in active settlement negotiations. These settlement discussions are being conducted in good faith and are not

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for the purposes of delay. While the settlement process is not complete, specific settlement offers, including specific dollar amounts and terms, have been exchanged, and the parties are of the opinion that with continued discussions, settlement negotiations may soon bear fruit. The parties therefore respectfully request additional time to attempt to conclude a settlement in this case. If a settlement is not reached by April 25, 2006, counterclaim defendant/third-party defendants will answer or take other appropriate action to respond to the counterclaims and third party claims pending against them.

The undersigned certifies that counsel for defendant/counterclaimant and third-party defendants have been contacted by this office concerning this motion, and they do not oppose this motion or the requested extension.¹

DATED this 6th day of April, 2006.

LANE POWELL LLC
Attorneys for Standard Insurance Company

By s/ Brad E. Ambarian
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I certify that on April 6, 2006, a copy of the foregoing was served by ECF on:

Linda M. O'Bannon, linda@dillonfindley.com
Ray R. Brown, ray@dillonfindley.com
Richard A Weinig, richard@akinsurancedefense.com
(still good per office manager)

s/ Brad E. Ambarian
120937.0001/154575.1

¹ When contact was made with the office of counsel for third-party defendant Andrew Klamser, it was learned that counsel Richard Weinig passed away earlier this week. It was further learned that it is believed that the insurer for Mr. Klamser will be reassigning the matter to a new attorney.